

EXHIBIT 87

12/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Nikolay Bashlykov 30(b)(6)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)
Individual and)
Representative)
Plaintiffs,)
)
v.) Case No.:
) 3:23-cv-03417-VC
META PLATFORMS, INC.,)
Defendant.)
)

** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **

Videotaped 30(b)(6) deposition of Defendant
META PLATFORMS, INC.,
by and through its corporate designee
NIKOLAY BASHLYKOV
Friday, December 6, 2024

London, England
United Kingdom

Reported stenographically by:
Leah M. Willersdorf,
RMR, CRR, FBIVR, ACR, QRR2*, CLR

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1 MR. WEINSTEIN: Object to form, calls for
2 speculation.

3 THE WITNESS: In which metric?

4 BY MS. POUEYMIROU:

5 Q. Can you tell me how many books that
6 dataset contains?

7 MR. WEINSTEIN: Object to form, outside
8 the scope, calls for speculation.

9 THE WITNESS: I don't know.

10 BY MS. POUEYMIROU:

11 Q. Any other datasets that were sourced from
12 LibGen?

13 A. Next page, 3, scitech-20231126.

14 Q. And what's the difference between that
15 file and the one you were just looking at?

16 A. It's a different subset of LibGen called
17 sci-tech.

18 Q. And this is all on Meta_Kadrey_Data_004;
19 is that correct?

20 A. Tt is.

21 Q. Are there any other datasets sourced from
22 LibGen on these hard drives?

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1 A. Page 6.

2 Q. Okay.

3 A. fiction-20231120.

4 Q. Mmm-hmm.

5 A. scimag-20231120, scitech --

6 Q. Mmm-hmm.

7 A. -- scitech-20231120.

8 Q. What's the difference between

9 fiction-20231120 and fiction-20231126?

10 A. So fiction-20231126 seems to be a
11 non-English part of fiction.12 Q. Mmm-hmm. And fiction-20231120 is a
13 English?

14 A. Correct.

15 Q. And it is fiction books written in
16 English?

17 MR. WEINSTEIN: Object to form.

18 THE WITNESS: Parts of it, yes.

19 BY MS. POUEYMIROU:

20 Q. What are the other parts?

21 MR. WEINSTEIN: Object to form, scope,
22 calls for speculation.

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1 CERTIFICATE OF COURT REPORTER

2 I, LEAH M. WILLERSDORF, Registered Merit
3 Reporter, Certified Realtime Reporter, Fellow of the
4 British Institute of Verbatim Reporters, Qualified
5 Realtime Reporter Level 2, and Certified LiveNote
6 Reporter, do hereby certify that:

7 NIKOLAY BASHLYKOV appeared before me on Friday,
8 December 06, 2024, was sworn by me and was thereupon
9 examined by counsel; that the testimony of said
10 witness was taken by me stenographically; that the
11 foregoing is a true and accurate record to the best of
12 my knowledge, skill and ability; that I am neither a
13 relative nor employee of any party to the action in
14 which this testimony was taken; that I am neither
15 relative nor employee of any attorney or counsel
16 employed by any party thereto; and, further, I am not
17 financially or otherwise interested in the outcome of
18 the action.

19

20



21

LEAH M. WILLERSDORF

22

RMR, CRR, FBIVR, ACR, QRR2, CLR

(December 08, 2024)